

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Minnesota Chamber of Commerce, *a*
Minnesota nonprofit corporation,

Plaintiff,

vs.

John Choi, in his official capacity as
County Attorney for Ramsey County,
Minnesota; George Soule, in his official
capacity as Chair of the Minnesota
Campaign Finance and Public Disclosure
Board; David Asp, in his official capacity
as Vice Chair of the Minnesota Campaign
Finance and Public Disclosure Board;
Carol Flynn, in her official capacity as
Member of the Minnesota Campaign
Finance and Public Disclosure Board;
Margaret Leppik, in her official capacity
as Member of the Minnesota Campaign
Finance and Public Disclosure Board;
Stephen Swanson, in his official capacity
as Member of the Minnesota Campaign
Finance and Public Disclosure Board; and
Faris Rashid, in his official capacity as
Member of the Minnesota Campaign
Finance and Public Disclosure Board,

Defendants

Case No.: 0:23-cv-02015

**SUPPLEMENTAL
DECLARATION OF THOMAS H.
BOYD IN SUPPORT OF
PLAINTIFF’S MOTION FOR
SUMMARY JUDGMENT**

I, Thomas H. Boyd, hereby declare:

1. I am a Shareholder with the law firm of Winthrop & Weinstine, P.A., and I am one of the attorneys of record in this matter for Plaintiff Minnesota Chamber of Commerce (“Chamber”).

2. A true and correct copy of Jeffery Sigurdson's signed errata sheet to his deposition is attached hereto as **Exhibit A**.

3. A true and correct copy of a bates labeled document CHAMBER000340 is attached hereto as **Exhibit B**.

4. A true and correct copy of excerpts from the January 8, 2024 deposition of Jeffrey Sigurdson are attached hereto as **Exhibit C**.

I DECLARE ON THE PENALTY OF PERJURY THAT THE ABOVE IS TRUE AND CORRECT. Signed and stated in the County of Hennepin, in the State of Minnesota.

Dated: September 6, 2024

s/Thomas H. Boyd
Thomas H. Boyd

29682949v2

Exhibit A

ERRATA SHEET

Case Name: MN Chamber of Commerce v. Choi, et al.

Date of Deposition: January 8, 2024

Deponent's Name: Jeffrey Sigurdson

Page/Line	Correction or Change	Reason
Page 115 Line 21	I believe I said "used for the contribution" the court reporter	
	heard "rules for the contribution".	

I, Jeff Sigurdson have read the
(print your name)
transcript and request these change be noted for the
reasons indicated.


Date: 1/25/2024 Sig.: 
INSTRUCTIONS: Return this signed sheet to Counsel within
30 days of the final transcript notification email and
send a copy to our court reporting office:
erratas@myrina.com.

Exhibit B

Message

From: Bordelon, Laura [lbordelon@mnchamber.com]
Sent: 8/27/2024 10:30:43 AM
To: Halloran, Cianna [CHalloran@winthrop.com]
Subject: FW: Pro Jobs deposit

FYI

From: Kojetin, Annette <AKojetin@mnchamber.com>
Sent: Tuesday, August 27, 2024 10:30 AM
To: Bordelon, Laura <lbordelon@mnchamber.com>
Cc: Loon, Doug <dloon@mnchamber.com>; Cook, Brian <bcook@mnchamber.com>; Farrell, Amanda <AFarrell@mnchamber.com>
Subject: RE: Pro Jobs deposit

Transfer completed.

~Annette



ANNETTE KOJETIN, CPA
Vice President, Chief Financial Officer

380 St. Peter Street, Suite 1050, St. Paul, MN 55102
 P: 651.292.4687 C: 612.816.0841
www.mnchamber.com

From: Bordelon, Laura <lbordelon@mnchamber.com>
Sent: Tuesday, August 27, 2024 10:24 AM
To: Kojetin, Annette <AKojetin@mnchamber.com>
Cc: Loon, Doug <dloon@mnchamber.com>; Cook, Brian <bcook@mnchamber.com>
Subject: Pro Jobs deposit

Annette – please transfer \$250,000 from the Chamber to Pro Jobs Majority. Doug has approved.

Thank you.



LAURA BORDELON
Senior Vice President, Advocacy

380 St. Peter St., Suite 1050, St. Paul, MN 55102
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Exhibit C

1 the question is 7, parenthetical (b)?

2 MR. BOYD: Yes.

3 MS. KIMBLE: I think that's clear. Thank
4 you.

5 MR. BOYD: Yeah. No. Thank you.

6 BY MR. BOYD:

7 Q Subdivision 7(b), referencing knowingly violating the
8 section, would your answer be the same, Mr. Sigurdson?

9 A Yes.

10 Q All right. As I understand it, under Minnesota Statute
11 10A.022, subdivision 7, "A matter that is under the
12 board's jurisdiction pursuant to that section that may
13 result in a criminal offense must finally be disposed of
14 by the board before the alleged violation may be
15 prosecuted by a city or county attorney." Is that
16 correct?

17 A Yes.

18 Q So with regard to a Subdivision 6(b) and Subdivision
19 7(b) of Chapter 211B.15, would the board need to finally
20 dispose of its investigation and make a determination as
21 to any enforcement before the county prosecutor could
22 pursue a criminal prosecution for any violation of the
23 statute?

24 A I would word it a little differently. My understanding
25 is that the board cannot refer any matter to the county

1 attorney under those two provisions prior to finishing
2 its own investigation. I don't believe it necessarily
3 prevents someone from filing a complaint directly with
4 the county attorney, but I don't believe the board could
5 refer a matter until it had closed its own
6 investigation.

7 Q So again referencing to Minnesota Statute 10A.022,
8 subdivision 7, that provision of statute restricts the
9 authority of the board to make a referral to a county or
10 city prosecutor, but it does not restrict the county or
11 city prosecutor from taking action on its own; is that
12 correct?

13 A That's my understanding, yes, sir.

14 Q Okay. Based on that understanding, would it be your
15 view that a county prosecutor could initiate an
16 investigation and a potential criminal prosecution for
17 violation of 211B.15, Subdivision 6(b) or Subdivision
18 7(b) without the requirement of a referral from the
19 board?

20 MS. KIMBLE: Objection. Legal
21 conclusion.

22 You can answer.

23 A That's my understanding, sir.

24 BY MR. BOYD:

25 Q Thank you.

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DISTRICT OF MINNESOTA

Case No.: 0:23-cv-02015 (ECT/DJF)

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- - - - -
Deposition of

JEFFREY SIGURDSON

Monday, January 8, 2024

9:05 a.m.

Court Stenographer:
Myrina A. Kleinschmidt, RMR, CRR, CRC